

## **CONTINUATION OF APPLICATION FOR A SEARCH WARRANT**

I, Timothy Hunt, have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since 2003. My responsibilities include the investigation of criminal violations of Titles 18 and 21 of the United States Code. I have participated in hundreds of investigations involving firearms and narcotics, which have resulted in the arrest and conviction of criminal defendants and the seizure of firearms and narcotics.

### **INTRODUCTION AND PURPOSE OF THE WARRANT**

1. I make this continuation in support of an application for a search warrant to collect a DNA buccal swab from the person of **Daveon WILLIAMS**, of Kentwood, Michigan, born in May of 2001, to examine it for evidence of criminal activity including theft from a federally licensed firearms dealer, in violation of 18 U.S.C. § 922(u).

2. As set forth herein, there is probable cause to believe that comparison of a DNA sample, to be collected from the person of **Daveon WILLIAMS** pursuant to this warrant, to a DNA sample that was collected related to the burglary of Long Range Archery and Firearms (“Long Range”) during the night of 14 July 2019 will produce evidence of a violation of 18 U.S.C. § 922(u) [Theft of firearms inventory from a federally-licensed dealer].

3. The information contained in this continuation is based upon investigation I have conducted, and on information related to me by other law enforcement officers who have worked on this investigation. Because this continuation is submitted for the limited purpose of demonstrating probable cause to search, I have not included every fact relevant to the investigation.

### **FACTS SUPPORTING PROBABLE CAUSE**

4. I, along with state and local law-enforcement agencies, am investigating a series of recent burglaries of Federal Firearms Licensee (FFL) businesses in the Western District of

Michigan where firearms were stolen in violation of 18 U.S.C. 922(u). The burglaries have been perpetrated during early morning hours, and have been carried out by young males who act as a team (or teams) that enter and exit victim businesses, stealing numerous firearms within a few minutes.

5. Long Range is a licensed firearms dealer located at 2530 Van Ommen Drive, Holland, Michigan. On 14 July 2019 at approximately 4:55 A.M., the alarm system at Long Range activated. Officers from the Ottawa County Sheriff's Office responded and arrived at the business around 4:59 A.M., where they discovered that a glass side-entry door to the business had been smashed open. The officers secured the exterior of the business, and then entered to conduct a security sweep of the interior. During the initial sweep, the officers saw that numerous handguns had apparently been taken from the business.

6. The owners of Long Range arrived at the business not long after the sweep was completed and assisted officers in conducting an inventory of missing firearms. It was determined that six (6) handguns of various makes, models and calibers had been stolen. A review of security video revealed that several subjects with masks and covered faces had broken into the business and stolen the firearms.

7. "Bullet Hole Firearms and Training" (Bullet Hole) is a licensed firearms dealer located at 513 E 8th Street, #15, Holland, Michigan. According to the owners of Bullet Hole, their video security system recorded a person looking through the store's front door at about 4:41 A.M. on 14 July 2019. This person's clothing appeared to be the same or similar to clothing worn by one of the persons recorded on Long Range's video during the break-in at 4:55. According to Google Maps, the three most likely driving routes between Bullet Hole and Long Range cover between 2.7 and 3.2 miles with driving times between five to eight minutes.

8. On 9 September 2019 at about 2:43 A.M., the alarm system at Long Range activated again. Officers from the Ottawa County Sheriff's Office responded and arrived at the business at about 2:46, where they discovered that a glass main-entry door to the business had been smashed open. The officers secured the exterior of the business and then entered to conduct a security sweep of the interior. A hammer located just inside the entry door was collected as evidence.

9. The owners of Long Range arrived at the business not long after the sweep was completed and assisted officers in conducting an inventory of missing firearms. It was determined that two (2) firearms had been stolen, a BG Defense AR-15 rifle and a Mossberg Model 590 Shockwave 12 gauge shotgun.

10. On May 28, 2019, Michael Kim LE was released on parole from the Michigan Department of Corrections (MDOC). In September 2019, LE resided with his mother at 4893 Champion Avenue SE, Kentwood, Michigan. LE's cellphone number on file with MDOC was 616-675-0666. On 13 September 2019, local law-enforcement, including State of Michigan Parole Officers, went to LE's residence for a parole-compliance check and to look for evidence of a recent vehicle theft that LE was suspected of having committed. LE fled the residence on foot and escaped, but officers found a loaded .38 caliber Smith & Wesson revolver hidden between LE's mattress and box springs. It was subsequently determined that the revolver was one of the six handguns stolen from Long Range on 14 July 2019.

11. LE was located and arrested later in the day on 13 September for parole violations. Parole Officers seized LE's cell phone and searched it under authority of LE's parole conditions. Officers discovered numerous photos and videos of LE and firearms, including what appeared to be the stolen Smith & Wesson. They also found pictures of a black Mossberg

firearm, including a close-up of its serial number, V1020053. That firearm was confirmed as the Mossberg 12-gauge shotgun stolen from Long Range on 9 September 2019.

12. On 16 January 2020, law enforcement interviewed LE in the presence of his attorney. LE admitted to conducting the 14 July 2019 burglary of firearms from Long Range. LE named the following individuals as participating in this burglary: Daveon “Madison Slick” WILLIAMS (identified by law enforcement as **Daveon WILLIAMS**); Mikhail “Kai” DAVENPORT (identified by law enforcement to be Mikhail Shequol DAVENPORT); and “Tink” WHITE, whose first name begins with “Z” (identified by law enforcement to be Ziquadreon Arshawn WHITE). LE described receiving one firearm from this burglary, specifically the revolver recovered from his home in September 2019. LE stated that **Daveon WILLIAMS** had accidentally cut himself on broken glass during the July burglary. LE also described the vehicle that they used during the course of this burglary as a Saturn SUV.

13. A Saturn VUE SUV, matching both LE’s description and recordings made by the surveillance system at Long Range during the 14 July burglary, was reported as stolen in Grand Rapids, Michigan on 13 July 2019. That vehicle was recovered in Wyoming, Michigan, on 18 July 2019. The Grand Rapids Police Department collected swabs of both suspected blood and “touch DNA” (swabs collected from surfaces that were likely to have been touched by a suspect in a way that deposits sufficient bodily tissue or fluid to contain DNA) from this vehicle for DNA analysis. Later analysis determined that one of the DNA contributors was Mikhail DAVENPORT. Other DNA contributors, including the blood contributor, were not identified.

14. The United States Attorney’s Office has informed me that the Fifth Amendment privilege against self-incrimination does not apply to evidentiary use of a person’s physical characteristics such as voice, handwriting, hair, blood-type or DNA. See, e.g., Schmerber v.

California, 384 U.S. 757, 765 (1985); Wilson v. Collins, 517 F.3d 421, 431 (6th Cir. 2008). I also know from training and experience that collecting DNA by buccal swab is a painless, safe, and minimally-invasive technique that is commonly used to collect DNA. A cotton-tipped applicator is touched against the inside of the person's cheek to collect a saliva sample for analysis.

15. **WILLIAMS** was arrested by officers of the Grand Rapids Police Department on 17 March 2021 on outstanding warrants issued by Kent County courts. As a result of that arrest, he is also facing new felony drug-trafficking charges. **WILLIAMS** is currently in custody at the Kent County Correctional Facility (KCCF), and the search warrant will be executed at that location. This Court previously issued a warrant for collection of DNA samples from **WILLIAMS** on 25 June 2020 in Case No. 1:20-MJ-237, but he was released from KCCF before investigating agents were able to execute that warrant.

### CONCLUSION

I submit that there is probable cause to believe that a DNA buccal swab from the person of **Daveon WILLIAMS** will produce evidence of a violation of 18 U.S.C. § 922(u), and respectfully request that the Court issue a search warrant authorizing the collection of such a sample.